



**State of Utah**  
 DEPARTMENT OF NATURAL RESOURCES  
 DIVISION OF OIL, GAS AND MINING

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October 1, 1999

TO: File

THRU.: Daron Haddock, Permit Supervisor *DH*

THRU.: Bill Malencik, Project Lead *William Malencik per page*

FROM: Wayne H. Western, Senior Reclamation Specialist *WHW*

RE: Review of the Response to the Division Order, Lodestar Energy, Inc., Horizon Mine, ACT/007/020-DO99B, File #2, Carbon County, Utah

**Summary:**

The engineering sections of Division Order 99B have been reviewed. The Permittee did not adequately address all of the issues.

**Division Order #1a**

Update the text of the operation plan of the current MRP to accurately describe the coal conveyance system, separation facilities, coal storage areas, coal mine waste handling and storage facilities area, other materials handling and storage areas, snow storage areas and all haulage areas; and to clearly show on a map all the preceding in accordance with R645-301-500.

**Analysis:**

Plate 3-1, Surface Facilities, had been updated. The plate now shows the correct location of the coal conveyance system. The location of the coal storage areas on Plate 3-1 is confusing. The only the area labeled as coal storage is by the conveyor stacking tube. That area is labeled as coal storage by text and is also shaded. Other areas used for coal storage are shaded but not labeled. The legend does not state what the shading means.

Vicki Miller said, in a conversation with Wayne Western, "That the gray areas were coal storage areas and that the map should be revised to label all coal storage areas." To avoid confusion, the Division wants Permittee to identify what that shaded areas are in the legend.

The text has been updated to show the how those facilities will be operated.

**Findings:**

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requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

**R645-301-521.190** The Permittee must identify the gray areas on Plate 3-1 as coal storage areas. The Division recommends that the gray shading be identified in the legend.

**Division Order #1b**

Update the text and maps to show the reclamation plans for each of the preceding items if different than the current reclamation plan, or if the current plan does not include the preceding items in 1a in accordance with R645-301-500

**Analysis:**

In Section 3.5.3.2 of the DO response the Permittee states that noncoal waste will be disposed either of in the backfill or in State approved landfill. The Permittee did not state where the noncoal waste will be place on site or how the requirements of R645-528.332 will be met.

**Findings:**

The information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

**R645-301-528.332.** The Permittee must show the location of those areas where noncoal waste will be disposed on site. The Permittee must show how the groundwater will be protected from leachate from the noncoal waste. The Permittee must describe the how the material will be placed in the on site disposal areas.

**Division Order #2**

If coal mine waste is to be produced at the Horizon Mine, state the location and volume of temporary and final storage of coal mine waste at the Horizon Mine in accordance with R645-301-500.

**Analysis:**

The Permittee responded by stating that no coal mine waste would be deposited at the Horizon Mine.

While the Permittee may not bring underground development waste to the surface or process coal, other activities will produce material that must be disposed of in a refuse pile. The Permittee must have a disposal area for material removed from the sediment pond and ditches.

The Permittee states on Page 3-21 of the DO response that underground development waste may be shipped to Sunnyside Cogeneration Associates (Cogen) for disposal. The Division cannot allow material to be shipped to Cogen until that facility has received approval to accept that material. See R645-301-536.500, the Division must first grant Cogen approval to accept the material. The Permittee does not need Division approval to ship a product to Cogen. A product means material that will be used to generate electricity.

**Findings:**

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

**R645-301-536:** The Permittee must address how material removed during sediment pond and ditch clean out will be disposed. Even if no underground waste is brought to the surface or coal processing waste is generated some materials must be disposed in a coal waste facility.

**R645-301-536.500:** The Permittee may not ship coal mine waste to Sunnyside Cogeneration Associates until that facility has been approved by the Division to accept material from the Horizon Mine. Material sent to Cogen for electrical production is considered a product and does not need Division approval. The Permittee should change the wording of for disposal of material at Cogen to a product will be shipped to Cogen.

**Division Order #3**

Amend the text of Chapter 3 of the Horizon MRP, Section 3.3, P. 3-6 and 3-7, to clarify Horizon's Mining's current MRP designations of "coal", "rocky coal", "high ash coal", "waste rock", and "coal waste materials" as to how they fall under Utah Coal Mining Rules R645 et seq. of "coal", "coal mine waste", "underground development waste", or "coal processing waste". Horizon Mining must further clarify its criteria for underground development waste, specifically referencing a) Mine Safety and Health Administration (MSHA) standards regarding storage of underground development waste in the Horizon Mine workings prior to bringing the waste to the surface, and b) ASTM standards distinguishing high ash coal from underground development waste.

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**Analysis:**

The Permittee no longer refers to material brought to the surface as rocky coal, high ash coal. All material brought out of the mine has been classified as coal by the Permittee. No mine development waste will be brought out of the mine and no coal processing material will be done on the surface.

**Findings:**

The Permittee met the minimum requirements for this section.

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